

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Radiation - Standard Products - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: POLREP #1
First for the 650 East Gilbert Street parcel
Radiation - Standard Products

Wichita, KS
Latitude: 37.6748800 Longitude: -97.3305000

To: Don Lininger, EPA

From: Randy Schademann, OSC

Date: 8/9/2012

Reporting Period: 07/16/2012 thru 08/08/2012

1. Introduction

1.1 Background

Site Number:	A7N1	Contract Number:	EP-R7-07-12
D.O. Number:	0131	Action Memo Date:	6/13/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	7/16/2012	Start Date:	7/16/2012
Demob Date:		Completion Date:	
CERCLIS ID:	KSN000705966	RCRIS ID:	
ERNS No.:		State Notification:	KDHE
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-critical, fund-lead removal action.

1.1.2 Site Description

1.1.2.1 Location

650 East Gilbert Street, Wichita, Kansas.

1.1.2.2 Description of Threat

Radium-226 contaminated material.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Kansas Department of Health and Environment (KDHE) conducted field work in August, September and December 2007, to support a Unified Focus Assessment (UFA) Report issued in February 2008. Five groundwater samples and 24 soil samples were collected at 650 East Gilbert for the UFA. Analysis included radium-226, the eight Resource Conservation and Recovery Act (RCRA) metals and volatile organic compounds (VOCs). The UFA identified several areas that had elevated radium concentrations exceeding the standard established at 40 CFR § 192.12 for a cleanup level not to exceed background plus five pCi/g. (up to 81,800 pCi/g of radium-226). No samples were taken or field screening conducted at the 920 South St. Francis parcel during the KDHE UFA.

The EPA conducted field activities for a Removal Site Evaluation (RSE) in March and April of 2009. Field screening with radiation detectors and radiation analysis of soil samples further defined the vertical and aerial extent of contamination on the Gilbert parcel as well as identifying radium-contaminated material on the South St. Francis parcel.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Soil contaminated with radium-226 above the 6.87 pCi/g action level will be removed and transported to EnergySolutions' disposal facility in Clive, Utah. After removing the estimated 1,300 tons of soil from the affected area, the excavated soils will be replaced with clean soils. Clean soils are soils that have been analyzed for radium, with results indicating that the concentration is at or below the background and that all other hazardous substances, pollutants or contaminants are below residential soil screening levels as determined by the EPA, or as referenced in the Region 9 Preliminary Remediation Goal tables found at <http://www.epa.gov/region9/superfund/prgl/>, or as outlined in the KDHE RSK Manual, Version 5, 2010. The soils at the site will be backfilled with soil topped with either concrete or rock.

The excavated material will be transported and disposed of at a licensed facility in accordance with all applicable local, state and federal requirements.

At this time, no post removal site control will be necessary.

2.1.2 Response Actions to Date

A fund-lead, time-critical removal action was initiated on July 28, 2009, and field work was completed by July 31, 2009, at the 920 South St Francis Street parcel. Approximately 264 tons of radium-contaminated soil and bricks were excavated and transported for disposal at US Ecology's facility in Grand View, Idaho. The excavated areas were backfilled with soil.

A second fund-lead action was initiated on July 16, 2012, to address the contamination at the 650 East Gilbert Street parcel.

07/16/2012-07/18/2012 - Activities during this time period include mobilization of the Emergency and Rapid Response Services contractor (Environmental Restoration, LLC), the Superfund Technical Assessment and Response Team (START) contractor (TetraTech), and EPA personnel. A portable truck scale was delivered and set up. The scale will be utilized to determine weight of the material excavated to estimate number of rail cars required and then to ensure the cars are not overloaded.

07/19/2012 - Excavation of contaminated areas begins. Areas are designated as 1 - 12 (see attachment Figure-Standard Products Excavation Areas). Soil is being stockpiled on site and will ultimately be loaded onto rail cars for delivery to an Energy Solutions facility in Clive, Utah.

07/20/2012 KDHE's Kyle Parker on-site to evaluate potential underground storage tank in area 12. During the assessment, a 14-foot void was discovered while developing a bore hole with a Geoprobe. Parker will be advised when excavation begins. Excavation of area three was completed. The excavation is being guided by a 3x3 sodium iodide (NaI) probe being operated by START. Samples are being collected by START, using the Multi-Agency Radiation Survey and Site Investigation manual (MARSSIM) as guidance. Samples are being analyzed on-site by the EPA (with a 3x3 NaI probe) to help establish that the action level is being achieved.

07/21/2012 Completed excavation of area 4 and 7. Areas are being backfilled with soil being supplied by Cornejo and Sons. The soil had been previously sampled by START to establish that parameters meet the Kansas RSK standards.

07/22/2012 ERRS crew not on-site today (Sunday). START and EPA on-site to mark areas yet to be excavated and analyze samples.

07/23/2012 START's vehicle is vandalized while parked at the Holiday Inn Express at Dugan Road. Two 3x3 Nal probes and other equipment. Reports are made to the EPA regional office of the incident. Screening to evaluate excavation progress will be conducted with a 2x2 Nal probe. ERRS complete excavating area 12. The void identified during the 2009 assessment appears to have been a 4-inch diameter pipe. Excavation is conducted to 14 feet. KDHE's Parker is advised that no tank was encountered. OSC Schademmann meets with the Guadalupe Center's director--Pam Stanberry--to review excavation required in the alley between the site and the center. Schademmann also contacts the following city of Wichita contacts concerning excavation in the aforementioned alley: Bill Perkins for sewer lines, Paul Gunzelman for traffic control and Tom Collins for inspection of the alley repair.

07/24/2012-07/27/2012 - ERRS crews completed excavations of areas 2 and 11. They also excavated an area inside of the on-site building. A small concrete vault (roughly 2'x2'x2.5') was uncovered when the floors concrete was removed. Material inside the vault was elevated as determined by field screening and was removed.

07/28/2012-07/30/2012 ERRS crews completes excavation of areas 6, 8, and 9, which were in the alley that separates the Guadalupe Center from 650 East Gilbert Street. The excavation was conducted on a weekend to minimize disruption to the clinic. The sections were repaired with asphalt on 07/30.

08/07/2012 - The first rail car was loaded. The rail cars are flatbeds with four intermodals per car. Energy Solutions has a representative on-site for proper manifesting and to coordinate with the rail companies. KDHE's Rick Bean was on-site with two staffers for a brief walk through.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

A PRP search is in progress by the EPA.

2.1.4 Progress Metrics

<i>Wastestream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
<i>Radium contaminated material</i>	<i>Soil, bricks</i>	<i>Approximately 1200 tons</i>	<i>Multiple</i>	<i>None</i>	<i>Energy Solutions, Clive, Utah</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Area 1 remains to be excavated. That area is where the stockpiles of soil are being staged. It is anticipated that it will be excavated during the week of August 13. It is anticipated that all radium contaminated material will be shipped off-site by August 17, 2012.

2.2.1.2 Next Steps

Complete site restoration.

2.2.2 Issues

None at this time.

2.3 Logistics Section

Logistics are being handled by the ERRS Response Manager in coordination with the OSC.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$523,692.00	\$379,020.00	\$144,672.00	27.63%
TAT/START	\$33,600.00	\$9,000.00	\$24,600.00	73.21%
Intramural Costs				
USEPA - Direct	\$25,000.00	\$13,000.00	\$12,000.00	48.00%
Total Site Costs	\$582,292.00	\$401,020.00	\$181,272.00	31.13%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

All removal work is being conducted in accordance with the approved Site Safety Plan and under the guidance of the EPA Region 7 Radiation Safety Officer, Chuck Hooper.

2.6 Liaison Officer

Beckie Himes, Community Involvement Coordinator with the EPA Region 7 - Office of Public Affairs, will serve as the Liaison Officer.

2.7 Information Officer

Beckie Himes, Community Involvement Coordinator with the EPA Region 7 - Office of Public Affairs, will serve as the Information Officer.

2.7.1 Public Information Officer

A fact sheet was prepared and delivered to congressional and state representatives. Local government notification was conducted through the Wichita Health Department.

2.7.2 Community Involvement Coordinator

Beckie Himes, Community Involvement Coordinator with the EPA Region 7 - Office of Public Affairs, will serve as the CIC.

3. Participating Entities

3.1 Unified Command

A unified command was not established for this activity.

3.2 Cooperating Agencies

US EPA
KDHE
Sedgwick County Health Department
City of Wichita

4. Personnel On Site

During the majority of the removal activities, there were 10 personnel on site: two EPA On-Scene Coordinators, seven Emergency and Rapid Response Services (ERRS) contractors, and one Superfund Technical Assessment and Response Team (START) contractor.

5. Definition of Terms

BAR - Bureau of Air and Radiation
CERCLA - Comprehensive Environmental Response and Liability Act
CFR - Code of Federal Regulations
EPA - U.S. Environmental Protection Agency
ERRS - Emergency and Rapid Response Services
KDHE - Kansas Department of Health and Environment
MARSSIM - Multi-Agency Radiation Survey and Site Investigation Manual
pCi/g - picocuries per gram
RCRA - Resource Conservation and Recovery Act
RSE - Removal Site Evaluation
RSK - Risk-based Standards for Kansas
START - Superfund Technical Assistance and Response Team
UFA - Unified Focus Assessment
UMTRCA - Uranium Mill Tailings Radiation Control Act

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information please refer to <http://www.epaossc.org/standardproducts>.

6.2 Reporting Schedule

POLREPS will be written and posted periodically (as developments warrant).

7. Situational Reference Materials

February 12, 1998, memorandum from Stephen Luftig, the Director of the Office of Superfund Remediation Technology Innovation (February 12, 1998, Directive number 9200.4-25)

Section 275 of the Atomic Energy Act, 42 U.S.C. § 2022, as amended by section 206 of the UMTRCA of 1978, 42 U.S.C. § 7918, and regulations at 40 CFR § 192.12

Region 9 Regional Screening Level tables found at <http://www.epa.gov/region9/superfund/prg/>

[KDHE](#) RSK Manual, Version 5, 2010